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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

April 21, 2015

Ms. Sheryl L. Spiller, Director
Los Angeles County Department of Public Social Services
12860 Crossroads Parkway South
City of Industry, CA 91746

Dear Ms. Spiller:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of July-August 2014. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact Daniel Cervantes at (916) 654-0946. You may also contact us by e-mail at Daniel.Cervantes@dss.ca.gov.

Sincerely,

Original signed by Lisa Bandaccari for

JIM TASHIMA, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Charles Palmer, Civil Rights Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
LOS ANGELES DEPARTMENT
OF PUBLIC SOCIAL SERVICES**

**Conducted on
July 28-July 31, 2014
August 25 -28, 2014**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
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Reviewer

Daniel Cervantes

TABLE OF CONTENTS

- I. INTRODUCTION**
- II. SUMMARY OF METHODOLOGY**
- III. DISSEMINATION OF INFORMATION**
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**
- VII. STAFF DEVELOPMENT AND TRAINING**
- VIII. DISCRIMINATION COMPLAINT PROCEDURES**
- IX. COMMUNITY INPUT**
- X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**
- XI. CONCLUSION**

I. CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Los Angeles County Department of Public Social Services with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted beginning on July 28 through July 31, 2014. The second part of the review was conducted on August 25 through August 28, 2014. An exit interview was held on August 28, 2014, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs Reviewed	Non-English languages spoken by a substantial number of clients (5% or more)
IHSS Metro	2707 S. Grand Ave Los Angeles, CA 90007	IHSS	Spanish, Farsi, Cantonese, Armenian, Korean, Russian
Santa Clarita District	27233 Camp Plenty Rd. Canyon Country, CA 91351	CalWORKS CalFRESH	Spanish
East Valley District No. 11	14545 Lanark St. Panorama City, CA 91402	CalWORKS CalFRESH	Spanish, Armenian
Customer Service Center 2	9451 Corbin Ave Northridge, CA 91324	n/a	n/a
Cudahy District Office	8130 S. Atlantic Ave Cudahy, CA 90201	CalWORKS CalFRESH	Spanish
Lincoln Heights District Office 66	4077 N. Mission Rd. Los Angeles, CA 90032	CalWORKS CalFRESH	Spanish, Cantonese
GAIN Region V South County Main	2959 E. Victoria St. Rancho Dominguez, CA 90221	GAIN	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2013-14 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups. In this review the following organization(s) were contacted for feedback. The following organizations responded to our request:

Luong Chau, Claudia Menjivar, and Connie Lo
 Legal Aid Foundation of Los Angeles
 1102 Crenshaw Blvd
 Los Angeles, CA 90019
 1-800-399-4529
www.lafla.org

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	33	30
Adult Program Workers	4	4
Receptionist/Screeners	6	6

Total	43	40
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An additional 2 staff interviews were scheduled but were not conducted due to staff unavailability.

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

English speakers' case files reviewed	15
Non-English or limited-English speakers' case files reviewed	123
Languages of clients' cases	English, Spanish, Korean, Armenian, Arabic, Cambodian, Hindi, Farsi, Russian, Tagalog, French, Cantonese, ASL

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX summarizes findings from discussions with community organizations, including advocate groups.

Section X reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XI of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			The public contact offices visited have business hours of 8:00 AM to 5:00 PM. Clients can also apply for benefits using the Your Benefits Now option online (currently available in 9 languages)
Does the county have extended hours to accommodate clients?	X			Social workers in the IHSS program go to the client's homes from the hours of 8:00 AM to 6:00 PM.
Can applicants access services when they cannot go to the office?	X			See comments above. Services can also be accessed by mail, Your Benefits Now (YBN), Interactive Voice Response (IVR), the LADPSS Website, and the customer service toll free line.
Does the county ensure the awareness of available services for individuals in remote areas?	X			Program and service information is available through posters, pamphlets, community outreach, radio announcements, YBN online, and the LADPSS website.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	X			All public contact offices visited had all available languages prominently displayed in the lobby.
Is the pamphlet distributed and explained to each client at intake	X			The PUB 13 is given and explained to

Signage, posters, pamphlets	Yes	No	Some-times	Comments
and re-certification?				clients at intake and recertification. Further, LADPSS employees document in the appropriate program the distribution/ explanation of the pamphlet.
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukrainian, and Vietnamese?	X			Yes. The most current version of the PUB 13 pamphlet was prominently displayed in lobby of the offices visited.
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?				N/A. See comments above.
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	X			
Were the current versions of the required posters present in the lobbies?	X			All offices visited had the most current version of the posters prominently displayed in the lobby.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	X			All workers interviewed were aware of the location of the CRC's information on the required posters.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?			X	GAIN Region V – Various signs (6 total) were not translated into the office's threshold language. All other offices visited had properly translated directional and instructional signage.

B. Corrective Actions

Informational Element	Corrective Action Required
Directional signage	Los Angeles County Department of Public Social Services shall ensure that instructional and directional signs are posted in waiting areas and other places that are frequented by clients and that where such areas are frequented by a substantial number of non-English-speaking clients, such signage shall be translated into appropriate languages. Div. 21-107.212 and .24

C. Recommendation

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	06/11
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Bureau to receive the most recent versions, or download the Pub 13 from the CRB website

<http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: IHSS Metro 2707 S. Grand Ave, Los Angeles, CA 90007

Facility Element	Findings	Corrective Action
Water fountain	Water fountain too tall at 39".	Spout outlets shall be 36" max. above the finish floor or ground. (CA T24 11B-602.4) (ADA 602.4) pg 303 The spout shall be located 15" min. from the vertical support and 5" max. from the front edge of the unit, including bumpers. (CA T24 11B-602.5) (ADA 602.5) pg 303
Restroom	Men's Restroom (Lobby 1) Restroom door pressure excessive at 15 lbs. Permanent restroom identification on wall too low at 40" on center.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg 224 Tactile characters on signs shall be located 48" min. above the finish floor or ground surface, measured from the baseline of the lowest Braille cells and 60" max. above the

		finish floor or ground surface, measured from the baseline of the highest line of raised characters. Fig. 8 (CA T24 11B-703.4.1) (ADA 703.4.1) Pg. 311
	Woman's Restroom (Lobby 1)	
	Restroom door pressure excessive at 10 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg 224
	Permanent restroom identification on wall too low at 40" on center.	Tactile characters on signs shall be located 48" min. above the finish floor or ground surface, measured from the baseline of the lowest Braille cells and 60" max. above the finish floor or ground surface, measured from the baseline of the highest line of raised characters. Fig. 8 (CA T24 11B-703.4.1) (ADA 703.4.1) Pg. 311
	Woman's Restroom (Lobby 4)	
	Restroom door pressure excessive at 10 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg 224

2. Facility Location: 27233 Camp Plenty Rd Santa Clarita, CA 91351

Facility Element	Findings	Corrective Action
Exterior entrance	Entrance door pressure excessive at: (as you face the building from the outside, left to right)	The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and

	<p>Door 1: 11 lbs Door 2: 12 lbs Door 3: 6 lbs Door 4: 15 lbs</p>	<p>gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224</p>
Restroom	<p>Men's: Signage on door is not ADA complaint. (Generic Square sign)</p> <p>No ADA accessible signage on wall for permanent identification.</p>	<p>Men's toilet and bathing facilities shall be identified by an equilateral triangle, ¼" thick with edges 12" long and a vertex pointing upward. (CA T24 11B-703.7.2.6.1) pg 310</p> <p>The triangle symbol shall contrast with the door, either light on a dark background or dark on a light background. (CA T24 11B-703.7.2.6.1) pg 310</p> <p>The symbol shall be mounted at 58" min. and 60" max. above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) pg 310</p> <p>Where a door is provided the symbol shall be mounted within 1" of the vertical centerline of the door. (CA T24 11B-703.7.2.6) pg 310</p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at</p>

		<p>the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) pg 311</p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. (CA T24 11B-703.4.2) (ADA 703.4.2) pg 311</p> <p>The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg 224</p> <p>Women's: Signage on door is not ADA complaint. (Generic Square sign)</p> <p>Women's toilet and bathing facilities shall be identified by an equilateral triangle, 1/4" thick with edges 12" long and a vertex pointing upward. (CA T24 11B-703.7.2.6.1) pg 310</p> <p>The triangle symbol shall contrast with the door, either light on a dark background or dark on a light background. (CA T24 11B-703.7.2.6.1) pg 310</p> <p>The symbol shall be mounted at 58" min. and 60" max. above the finish floor or ground surface measured from the centerline of the symbol. (CA T24 11B-703.7.2.6) pg 310</p> <p>Where a door is provided the symbol shall be mounted within 1" of the vertical centerline of the door. (CA T24 11B-703.7.2.6) pg 310</p>
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	Door pressure excessive at 10 lbs.	The force required to activate operable parts shall be 5 lbs. (CA T24 11B-309.4) (ADA 309.4) pg 224
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3. Facility Location: 14545 Lanark St., Panorama City, CA 91402.

Facility Element	Findings	Corrective Action
Restroom	<p>Men's: No ADA accessible signage on wall for permanent identification.</p> <p>Women's: No ADA accessible signage on wall for permanent identification.</p>	<p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) pg 311</p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. (CA T24 11B-703.4.2) (ADA 703.4.2) pg 311</p> <p>Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. (CA T24 11B-703.4.2) (ADA 703.4.2) pg 311</p> <p>Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. (CA T24 11B-703.4.2) (ADA 703.4.2) pg 311</p>

4. Facility Location: 4077 N Mission Rd Los Angeles, CA 90032

Facility Element	Findings	Corrective Action
Exterior entrance	Entrance door pressure excessive at 12 lbs. (both doors)	<p>The force for pushing or pulling open a door or gate other than fire doors shall be as follows:</p> <ol style="list-style-type: none"> 1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1 - 4)) (ADA 404.2.9 (1 & 2)) pg 224

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			If the first contact worker cannot immediately identify the language spoken by the client, a poster prominently displayed with several languages is used to identify the person's language.
Does the county use a primary language form?	X			LADPSS uses the PA 481 Language Designation Form
Does the client self-declare on this form?	X			Client must select his/her oral <u>and</u> written preference. The form must then be signed and dated by both the worker and the client.
Are non-English- or limited- English-speaking clients provided bilingual services?			X	LADPSS' protocol is to assign a bilingual case to a corresponding bilingual worker. If a worker is unavailable in the client's language, workers can use other county workers as translators and/or the AVAZA Language Line. See additional comments below.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			See comments above.
Is there a delay in providing services?		X		The cases reviewed did not show any delay in bilingual services provided.
Does the county have a language line provider, a county interpreter list, or any other interpreter	X			LADPSS uses AVAZA Language Services Corp. for their over the phone interpreting services.

Question	Yes	No	Some-times	Comments
process?				
Are county interpreters determined to be competent?	X			Bilingual workers are required to be certified by the county by completing oral and written tests.
Does the county have adequate interpreter services?	X			All of the offices visited had an adequate amount of bilingual workers
Does the county allow minors to be interpreters? If so, under what circumstances?		X		
Does the county allow the client to provide his or her own interpreter?	X			If a client wishes to provide their own interpreter, the PA 481A form must be filled out and signed.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			If the worker feels as if the interpretive service provided by the client provided interpreter is inadequate, he/she may bring in a county certified interpreter to ensure adequate translation.
Does the county use the CDSS-translated forms in the clients' primary languages?			X	The SAWS 1 and SAWS 2 were only found in English in nearly all of the case files reviewed.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			LADPSS uses a filler letter that instructs the client to contact their worker if there is something that he/she does not understand.
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille	X			Auxiliary aids and services are available at each office upon the client's request.

Question	Yes	No	Some-times	Comments
material, taped text, large print materials (besides the Pub 13)?				
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			LADPSS managers and staff interviewed stated that they always ensure the client's needs are met regardless of the accommodation needed.
Does the county offer screening for learning disabilities?	X			The GAIN program offers screening for learning disabilities based on test results. Accommodations are made on an as needed basis.
Is there an established process for offering screening?	X			See comments above.

B. Additional Comments

At 14545 East Valley District 11, while reviewing an Arabic case, the information the reviewer needed was not available in the system. The reviewer went to the worker who was in the office that day to clarify some of the comments made in the LEADER system. The signed language preference form (PA 481) stated that the client preferred to speak in Arabic, but wanted all written correspondence in English. As the reviewer spoke to the worker, the worker admitted to speaking to the participant in English. The worker stated that the participant preferred to speak in English. The reviewer then explained to the worker the importance of making sure the participant is speaking in their preferred language and are receiving correspondence in their preferred language. Further, if the participants preferred language is not spoken during contact, the case notes should be documented to reflect the accommodations and the reason the client is not speaking in the preferred language. The worker understood the reasons and expectations of documenting a case thoroughly and accurately.

C. Corrective Actions

Area of Findings	Corrective Actions
Written Materials	Los Angeles Department of Public Social Services must use and provide translated forms, to include translated notice of action forms, in the clients' primary languages when translated by CDSS.

Area of Findings	Corrective Actions
	Div. 21-115.2

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	IHSS	GAIN/CalWORKS	Non-Assistance CalFresh
Ethnic origin documentation	SOC 295 Case narrative	GEARS PA 481	LEADER PA 481
Primary language documentation	SOC 295 Case narrative	GEARS PA 481	LEADER PA 481
Method of providing bilingual services and documentation	PA 481 Case narrative	GEARS PA 481	LEADER PA 481
Client provided own interpreter	PA 481A Case narrative	PA 481A Case narrative	PA 481A Case narrative
Method to inform client of potential problem using own interpreter	PA 481A Case narrative	PA 481A Case narrative	PA 481A Case narrative
Release of information to Interpreter	PA 481A Case narrative	PA 481A Case narrative	PA 481A Case narrative

Individual's acceptance or refusal of written material offered in primary language	PA 481 Case narrative	PA 481 Case narrative	PA 481 Case narrative
Documentation of minor used as interpreter	LADPSS does not use minors as interpreters	LADPSS does not use minors as interpreters	LADPSS does not use minors as interpreters
Documentation of circumstances for using minor interpreter temporarily	N/A	N/A	N/A
Translated notice of actions (NOA) contain translated inserts	CMIPS Case narrative	GEARS Case narrative	LEADER Case narrative
Method of identifying client's disability	CMIPS Case narrative	GEARS Case narrative	LEADER Case narrative
Method of documenting a client's request for auxiliary aids and services	CMIPS Case narrative	GEARS Case narrative	LEADER Case narrative

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when

Areas of Action	Corrective Action
	individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
Documentation of primary language	Each agency shall ensure that case record identification shows the applicants/recipient's ethnic origin and primary language. Div. 21-201.21
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
General	Los Angeles Department of Public Social Services County must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

C. Recommendation

LADPSS has effective forms that allow for thorough documentation. The forms, if filled out correctly and thoroughly, fulfill the state's requirements for documentation. Form PA 481, PA 481A were found in every case reviewed, but in many instances the form was not completely filled out or the form contradicted what was in the LEADER (or other relevant) program. Please see Division 21-116 and all relevant ACL/ACIN for more information and direction.

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
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Do employees receive continued Division 21 Training?	X			LADPSS holds regional annual training for ALL county employees.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			LADPSS employees are instructed to go through their Civil Rights Liaison (CRL) in their office, who then communicates with the Civil Rights Coordinator/investigator as needed.
Does the county provide employees Cultural Awareness Training?	X			LADPSS receives annual cultural awareness training in conjunction with the civil rights training.
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			

B. Corrective Actions

None

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program,	X			All LADPSS staff interviewed over the phone were able to differentiate between the

Interview and review areas	Yes	No	Some-times	Findings
discrimination, and a personnel complaint?				three types of complaints.
Did the employees know who the Civil Rights Coordinator is?			X	All LADPSS staff interviewed were aware of who the civil rights coordinator as well as the civil rights liaison in their office. See additional comments below.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?			X	All LADPSS staff interviewed over the phone knew where the civil rights poster was located. See additional comments below.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			

B. Additional comments

While visiting IHSS Metro, the reviewer asked the IHSS receptionist questions general questions that are asked during the phone interviews. The receptionist was able to provide me with the correct information regarding the PUB 13, the Civil Rights liaison and Civil Rights Coordinator, and how to file a discrimination complaint. Because the lobby is shared with other CDSS funded programs, specifically Cal FRESH, I asked the receptionist at the window directly to the left of the IHSS receptionist for a PUB 13. The CalFRESH receptionist was unable to produce a PUB 13. I then asked the CalFRESH receptionist if they could provide me with a discrimination complaint form so I could file a complaint. The receptionist handed me with a DPSS Service Satisfaction Survey in both English and Spanish. When asked about the Civil Rights Coordinators information, the receptionist was unable to provide the reviewer with neither the Civil Rights Liaison's information nor the Civil Rights Coordinator's information.

At the same location in Lobby 4 where another CDSS funded program is administered, I asked the receptionist (person 1) how to file a discrimination complaint. Person 1 told me I had to go to the main reception area upon entering the building. I asked person 1 who the Civil Rights Coordinator was and person 1 told the reviewer that information

could be found at the main reception area. Person 1 handed me a small white piece of paper with the title “Why wait in long lines?” The piece of paper was a phone number to the customer service center.

At the main reception area, the reviewer asked the only available receptionist (person 2) how to file a discrimination complaint. Person 2 went over to another receptionist (person 3) and asked for assistance. Both person 2 and 3 began looking through a file cabinet. Only then did a third worker (person 4) know exactly where the paperwork to file a complaint was located. Person 4 brought out a PUB 13, a PA 607, and the Civil Rights Information Notice. Person 4 was a supervisor.

D. Corrective Action

Per Division 21-203, all LADPSS staff must be aware of how to correctly respond to a client should they request a PUB 13, a civil rights complaint form, the CRC/CRL’s contact information, etc. Further, the receptionist at each office is almost always the client’s first interaction with the county. This makes the job of the receptionist critical in terms of providing information and any services needed by the client. Division 21-117 details the staff development and training each public contact employee shall receive as to ensure adequate services provided to the client.

IX. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations, and will provide issues that the county management team can address to improve their operations from a civil rights perspective.

A. Major observations include:

1. The amount of time LADPSS has to prepare for these types of reviews. They explained to the reviewer that they had just completed their own “Secret Shopper” visits within Los Angeles County. Findings for the “Secret Shopper” visits were not yet available as of the July 28, 2014 meeting date.
2. The lack of website accessibility and the number of languages available on the YOUR BENEFITS NOW webpage.
3. The number of available languages when the customer service number is called.
4. Accessibility of the offices. Certain offices within the county have lines so long that clients must wait outside. And when lines are out the door, they are not ADA friendly.
5. The procedure involved and the amount of time it takes to get an ASL interpreter.

X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Los Angeles County Department of Public Social Services Civil Rights Compliance Plan for the 2014-2015 fiscal year was received in February 2014. It is approved as submitted.

XI. CONCLUSION

The CDSS reviewer found the Los Angeles County Department of Public Social Services staff warm, welcoming, informative and very supportive. Special thanks to Mr. Charles Palmer, Ms. Sheila Early, and Mr. Juan Rizo for organizing the details of the review. In each District Office, county staff was very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Los Angeles County Department of Public Social Services in partial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Los Angeles County Department of Public Social Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.